

**FILED**

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

**MAR 08 2016**

**MATTHEW J. DYKMAN**

**CLERK**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**GLENN GENE FERNANDEZ,**

Defendant.

Cr. No. 16-838 JB

UNITED STATES' PROFFER OF EVIDENCE AT TRIAL

The United States of America hereby submits a proffer of evidence that if this matter were to proceed to trial, the United States would prove through competent and admissible evidence, beyond a reasonable doubt, that the Defendant violated 18 U.S.C. § 2250(a) and 42 U.S.C. § 16913, that being failure to update registration, by the following:

1. From on or about February 21, 2013, continuing to on or about December 1, 2015, in Rio Arriba County, in the District of New Mexico and elsewhere, the defendant, GLENN GENE FERNANDEZ failed to update a registration as required by Title 42, United States Code, Section 16913, the Sex Offender Registration and Notification Act.
2. The defendant is a person required to register under the Sex Offender Registration and Notification Act due to a conviction under the law of the State of California.
3. The defendant traveled in interstate commerce from California to New Mexico, and established residence in New Mexico.
4. The Defendant knowingly failed to register or update registration as a sex offender.

Respectfully submitted,

DAMON P. MARTINEZ

United States Attorney

  
For RAQUEL RUIZ-VELEZ (Sealed)

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I HEREBY CERTIFY that a true copy of  
this pleading was provided to Counsel for  
Defendant on March 8, 2016.

  
For Raquel Ruiz-Velez (Sealed)  
Assistant U.S. Attorney